

EXHIBIT 1



U.S. Department of Justice
Consumer Protection Branch

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March 22, 2024

VIA EMAIL

Jonathan D. Gershon
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Re: *United States v. Jason Edward Thomas Cardiff*,
5:23-cr-00021-BERNAL (C.D. Cal)

Dear Counsel:

Enclosed please find the government's eighth discovery production in the above-captioned matter. The enclosed production is provided on three hard drives. The password to access the drives will be emailed to you separately.

The eighth production contains three hard drives with forensic images of computers and other media. Specifically, there is a 2TB hard drive with forensic images of two computers and a cloud database that was obtained by the United States Postal Inspection Service (USPIS) on October 22, 2018. In addition, there are two 6TB hard drives containing 29 forensic images of computers and media sources that was obtained by the Federal Trade Commission ("FTC") and provided to our office on or about February 19, 2020. Material from 14 of the 29 forensic images was already produced to you in the fourth production with the bates prefix GOV004 as load-ready files from the FTC Relativity Workspace. Pursuant to the protective order entered by the Court on December 28, 2023 (Dkt. # 37), the government is identifying all of these documents as CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER.

Each hard drive has its own bates stamp number and the bates stamp range of this production is GOV008_00000001 through GOV008_000000003.

Once you have copied the two 6TB hard drives, please mail those hard drives back to me at the above-listed address.

United States v. Cardiff

Page 2 of 3

To the extent that the enclosed materials and any future discovery provided to you exceeds the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law, such materials are provided voluntarily and solely as a matter of discretion. By producing such materials to you, the government does not waive its right to object to any future discovery requests beyond the ambit of its legal obligations.

Respectfully,

A handwritten signature in black ink that reads "Manu J. Sebastian". The signature is written in a cursive, flowing style with a horizontal line underneath the name.

Manu J. Sebastian
Trial Attorney

Comprehensive Production Index as of March 22, 2024

BEG BATES	END BATES	DESCRIPTION
GOV_MOI_000001	GOV_MOI_001076	Agent Materials (USPIS MOIs, MTFs, etc.)
GOV_MOI_001077	GOV_MOI_001553	Additional Agent Materials (USPIS MTFs)
GOV_MOI_001554	GOV_MOI_001801	Additional Agent Materials (USPIS MOIs, MTFs, etc.)
GOV001_00000001	GOV001_00000335	Notable Documents (Lighthouse and Receiver)
GOV001_00025445	GOV001_00025452	Notable Documents (Sticky.io production)
GOV001_00025919	GOV001_00025924	Notable Documents (Sticky.io production)
GOV001_00000336	GOV001_00000753	Sticky.io (f/k/a Limelight) Documents
GOV001_00000754	GOV001_00001875	Discover (Subpoena Return)
GOV001_00001876	GOV001_00001977	First City Credit Union (Subpoena Return)
GOV001_00001978	GOV001_00002046	East-West Bank (Subpoena Return)
GOV001_00002047	GOV001_00002226	Bank of America (Subpoena Return)
GOV001_00002227	GOV001_00010271	Clear Trust (Subpoena Return)
GOV001_00010272	GOV001_00010272	Coin Base (Subpoena Return)
GOV001_00010273	GOV001_00010771	TD Ameritrade (Subpoena Return)
GOV001_00010772	GOV001_00011060	Meadows Bank (Subpoena Return)
GOV001_00011061	GOV001_00012651	JP Morgan Chase (Subpoena Return)
GOV001_00012652	GOV001_00013691	Payday Workforce Solutions (Subpoena Return)
GOV001_00013692	GOV001_00013722	Vantiv (FIS) (Subpoena Return)
GOV001_00013723	GOV001_00014340	Paychex (Subpoena Return)
GOV001_00014341	GOV001_00021171	American Express (Subpoena Return)
GOV001_00021172	GOV001_00021935	Answering Specialists (Subpoena Return)
GOV001_00021936	GOV001_00021938	FreeVoice (Subpoena Return)
GOV001_00021939	GOV001_00022492	UPIC Insurance Services (Subpoena Return)
GOV001_00022493	GOV001_00022618	Sticky.io (f/k/a Limelight) Documents
GOV001_00022619	GOV001_00025282	Answer Connect (Subpoena Return)
GOV001_00025283	GOV001_00026148	Sticky.io (f/k/a Limelight) Documents

GOV001_00026149	GOV001_00027218	Answer Connect (Subpoena Return)
GOV001_00027219	GOV001_00029792	EMC2 Billing (Subpoena Return)
GOV001_00029793	GOV001_00029884	Google (Subpoena Return)
GOV001_00029885	GOV001_00029927	Stamps.com (Subpoena Return)
GOV001_00029928	GOV001_00030109	JP Morgan Chase (Subpoena Return)
GOV001_00030110	GOV001_00030182	Google Search Warrant Return
GOV001_00030183	GOV001_00030683	Sticky.io (f/k/a Limelight) Documents
GOV001_00030684	GOV001_00031187	Grand Valley (Subpoena Return)
GOV001_00031188	GOV001_00275824	Danielle Walker (a/k/a Danielle Cadiz) Laptop
GOV001_00275825	GOV001_00275971	Chino Commercial Bank (Subpoena Return)
GOV001_00275972	GOV001_00276413	Mountain Grove Office Park (Subpoena Return)
GOV001_00276414	GOV001_00276655	Elavon (Subpoena Return)
GOV001_00276656	GOV001_00276747	JP Morgan Chase (Subpoena Return)
GOV002_00000001	GOV002_04035264	FTC Lighthouse Database
GOV003_00000001	GOV003_04505223	Redwood Receiver provided Google Documents
GOV004_00000001	GOV004_09053589	FTC Relativity Workspace
GOV005_00000001_0001.00001	GOV005_00000374_0002.00002	Communications between CPB and the FTC, and CPB and the Redwood Court-Appointed Receiver
GOV005_00000375_0001.00001	GOV005_00000378_0001.00002	CPB Form 712 and response, and USPIIS Form 712 and response
GOV005_00000379_0001.00001	GOV005_00000423_0001.00001	Additional communications between CPB and FTC
GOV005_00000424_0001.00001	GOV005_00000582_0001.00001	Communications between USPIIS and the FTC, and USPIIS and the Redwood Court-Appointed Receiver
GOV008_000000001	GOV008_000000003	USPIIS and FTC obtained forensic image hard drives